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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 4:19-cv-04281 KAW
	)	
Plaintiff,	)	<b>UNITED STATES' REQUEST TO ENTER</b>
	)	<b>DEFAULT OF ALEXANDER VINNIK</b>
v.	)	
	)	
BTC-e, a/k/a CANTON BUSINESS CORP.,	)	
	)	
and	)	
	)	
ALEXANDER VINNIK,	)	
	)	
Defendants.	)	

TO: THE CLERK OF THE U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA

Plaintiff United States of America ("Plaintiff"), by and through its undersigned counsel, hereby requests that the Clerk of the Court enter default of Defendant Alexander Vinnik ("Vinnik") pursuant to Fed. R. Civ. P. 55(a), on the ground that said defendant has failed to appear or otherwise respond to the complaint in a timely manner.

This request is based on the attached Declaration of Savith Iyengar ("Iyengar Decl.") and other filings in this matter, which show:

1. Defendant Alexander Vinnik was personally served with English and French versions of the Summons and Plaintiff's Complaint on November 18, 2021, as well as English and French versions

1 of the civil cover sheet, Clerk's notice regarding assignment to this Court, standing orders for this Court,  
2 standing order for all judges of this District, ECF registration information, notice of this lawsuit and  
3 request to waive service of summons, waiver of the services of summons, and notice of assignment to a  
4 Magistrate Judge with election form. *See* ECF Nos. 29, 29-1, 29-2, 29-3.

5 2. The proofs of service filed with this Court on April 19, 2022 establish that service was  
6 proper pursuant to Fed. R. Civ. P. 4(f)(1) and the Hague Service Convention. *Id.*

7 3. To date, Vinnik has failed to answer or otherwise respond to the complaint. Iyengar  
8 Decl. ¶ 4.

9 4. The applicable time limit for responding has expired. Fed. R. Civ. P. 12(a)(1)(A)(i); *see*  
10 *also* Iyengar Decl. ¶ 5.

11  
12 Respectfully submitted,

13  
14 STEPHANIE M. HINDS  
United States Attorney

15 Dated: July 18, 2022

16 By: /s/ Savith Iyengar  
SAVITH IYENGAR  
Assistant United States Attorney